

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

MINNIE TAYLOR, Individually and as
Personal Representative of the ESTATE OF
LOUIE TAYLOR, and HAROLD CUTHAIR,

Plaintiffs,

v.

No. 21-cv-00613-GJF-JFR

THE UNITED STATES OF AMERICA,

Defendant.

**PLAINTIFFS MINNIE TAYLOR'S AND HAROLD D. CUTHAIR'S ANSWERS AND
RESPONSES TO DEFENDANT'S FIRST SET OF WRITTEN DISCOVERY TO
PLAINTIFF (INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS)**

INTERROGATORY NO. 1: State your full name, current address, telephone

number, social security number, date of birth, place of birth, occupation, relationship to

Decedent, and any other name you have used during your lifetime.

ANSWER:

Minnie Taylor

DOB: [REDACTED]

SSN: [REDACTED]

Place of Birth: Aneth, Utah

Occupation: retired 11/21/2019

Relationship to Decedent: mother

Current Address: P.O Box [REDACTED] Shiprock, NM 87420

Harold D. Cuthair

DOB: [REDACTED]

SSN: [REDACTED]

Place of Birth: Cortez, Colorado

Occupation: unemployed

Relationship to Decedent: father

Current Address: [REDACTED] Colorado 81334

INTERROGATORY NO. 2:

State the full name of Decedent and provide

Decedent's social security number, date of birth, place of birth, and any other names Decedent used during his lifetime.

ANSWER:

Louie Dean Taylor - name on death certificate

*Lemar Dean Taylor – name on medical records from Northern Navajo Medical Center

*Lemar Cuthair – name on Shiprock Incident Report

*Dean Taylor – name on Inmate Medical Screening

*Dean Louie Taylor – name on Inmate Release of Property

Lemar Dean Cuthair

Lamar Cuthair

*Lamar Cethair

Lamar Taylor

*Carson Cuthair

Names provided with asterisks are based upon information provided by the United States.

DOB: 12/11/1986

Place of Birth: Shiprock, New Mexico

SSN: [REDACTED]

INTERROGATORY NO. 4:

State all physical addresses Decedent had during the ten (10) years prior to his death and provide the dates Decedent resided at each address.

ANSWER:

Minnie: Louie has lived all his life in Shiprock, NM – north of Shiprock next to 1st Baptist Church is the physical address. He lived in Colorado Springs, CO for 7 months, but I never knew his address.

Harold: P.O. Box 1821 Shiprock, NM 87420

INTERROGATORY NO. 10:

For ten (10) years prior to Decedent's death, list the names, addresses, and phone numbers of each healthcare and mental health practitioner, hospital, or other medical care or substance and/or alcohol abuse facility where Decedent received medical or mental health care or substance and/or alcohol abuse treatment, and for each provide the name, address, and phone number of the healthcare practitioner or medical facility, dates of service, reason for service, type of service received, and the nature of the injury or illness treated.

ANSWER:

- Minnie:** To the best of my information and belief, I am unaware of any health issues with Louie. He never had health care or mental health care. He never had any care, or needed any care, for substance or alcohol abuse and was never at a facility for substance or alcohol abuse. Louie was in good health and was never on any medications.
- Harold:** Indian Health Service was his healthcare provider in Shiprock, New Mexico if he needed medical care, which is Northern Navajo Medical Center. No substance or alcohol abuse facilities, no mental health issues to the best of my information and belief. To my knowledge, my son wasn't on any medication and he was in good health.

INTERROGATORY NO. 15:

State separately and itemize in detail each element

of damages claimed in this action, including the dollar amount to date and the method used to calculate the damages. With respect to special damages, provide the date the expense was incurred, the names and addresses of persons and institutions involved, and the amount paid to or owing each one.

ANSWER:

Damages: **Minnie Taylor:** I am unable to sleep. I wake up crying. I feel weak at times, like I will faint. I am light headed. I get emotional all the time and feel under a lot of stress. I am still grieving and I feel lonely every day. I do not feel like taking care of myself anymore only when I need to go somewhere. I am always alone and cry thinking about all the good times with my son. I am not really talking to anybody or my relatives. I have no interest in doing anything especially during the holidays. **I am still going to counseling at Shiprock PHS every month.** So many things have changed in my life with the loss of my son Louie. **My memory has been bad and I get headaches every day that I have to take Ibuprofen daily. My chest hurts sometimes when I get weak.**

I have lost my son's love, assistance, companionship, support, affection and all the consortium claims recognizable by the law of the State of New Mexico. Although priceless to me, I place a value of \$2,500,000.

For Louie's Estate: He suffered conscious pain and suffering derived from hallucinations and pounding on the cell doors and being locked up alone. He lost the value of his life, hedonic damages, and all other bases of damages for wrongful death cognizable under New Mexico law. I place a value of \$2,500,000.

Damages: **Harold Cuthair:** **Louie visited me weekly and sent me frequent text messages.** I miss that. My son was my child, his life met a lot to me, losing him has changed my life. I'm still grieving to this day. All the damages, suffering my son has endured during the time he was in the custody of the Navajo Police Department in Shiprock. **Now he's not here to share what we used to do together – talking, texting, to do things with him. Spending time with him, going to eat, visit, helping me to feed my horses, going to the casino, and just talking about our day, or what we want to do, and now that's not there – my son is no longer here to share that with him.** It's hard to deal with what has happened to Louie. I'm a singer. I sing Sundance songs, its healing for me – helps me deal with the loss of Louie so I sing my songs to help me refresh my mind, soul, my body. My prayers help me get through the emotional damages of losing my son, the way he left, knowing that he suffered in the jail cell, what he must've been going through the last hours of his life. That's something very hard to deal with, just imagine what my son was going through, while he needed medical care which was denied to him and just left in the jail cell neglected.

INTERROGATORY NO. 17: Had Decedent ever been convicted of, or pled guilty to, a felony or misdemeanor other than a traffic citation, ever been arrested, or ever been confined to any jail or penitentiary? If so, please state the date, place, names of any courts or jails involved, names of parties and attorneys involved, the nature of any charges, and punishment prescribed if any.

ANSWER:

Minnie: All I am aware of is an arrest in San Juan County in 2006 and one for an intoxication-related arrest in Shiprock. I do not know the dates and time in the Shiprock jail, dates are unknown to me.

Harold: I am unaware of any felony or misdemeanor arrests.

INTERROGATORY NO. 18: State the amount of net and gross income Decedent received from employment and/or any other compensation or benefits he received from any source during the ten (10) years preceding his death, breaking down the amount by year and by source for each and every year.

ANSWER:

Minnie: I am unsure.
Employment income and gaming income is unknown to me

Harold: My son received \$2,000.00 per year, (2) bonus \$200.00 (December and June) PerCap or Dividend from the Ute Mountain Ute Tribe (tax exempt). I am unaware of employment income.